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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WARREN HUCH,

Plaintiff,

VS.

PACIFIC SEAFOOD – LAS VEGAS, LLC,
et al.,

Defendants.

CASE NO.: 2:24-cv-01445-CDS-MDC

**STIPULATION AND ORDER TO
EXTEND DISCOVERY
DEADLINES**

(Second Request)

Pursuant to Local Rule IA 6.1 and 26-3, the Parties to this action, acting by and through their respective counsel of record, hereby stipulate and request the Court to order that all discovery deadlines be extended by 90 days. This is the second request for an extension of these deadlines. In support of this Stipulation and Order, the parties state as follows:

1. Plaintiff commenced this action on August 7, 2024, and service on the Defendants took place thereafter.

2. Defendants filed their answer on September 23, 2024.

3. After the answer was filed, Plaintiff and Defendants engaged in the planning conference mandated by Federal Rule of Civil Procedure 26(f) and submitted a discovery plan and scheduling order. The Court entered a scheduling order on October 21, 2024.

4. The Parties have exchanged their initial disclosures, as well as supplements.

1 5. On December 12, 2024, a Stipulation to Substitute Counsel for Defendants
2 was filed.

3 6. The Parties participated in an Early Neutral Evaluation on December 16,
4 2024, which did not result in a resolution of this case.

5 7. On January 13, 2025, the Defendants delivered interrogatories, requests for
6 admission, and requests for production of documents to the Plaintiff.

7 8. On February 3, 2025, the Plaintiff delivered interrogatories, requests for
8 admission, and requests for production of documents to the Defendants.

9 9. On February 26, 2025, the Plaintiff delivered his responses to Defendants'
10 requests for admission and requests for production of documents.

11 10. On February 27, 2025, the Plaintiff delivered his responses to Defendants'
12 interrogatories.

13 11. On March 4, 2025, the Defendants delivered amended requests for admission
14 to the Plaintiff.

15 12. On March 7, 2025, the Plaintiff delivered his response to Defendants'
16 amended requests for admission.

17 13. On March 19, 2025, the Defendants delivered their responses to Plaintiff's
18 interrogatories, requests for admission, and requests for production of documents.

19 14. The Parties have been working to resolve discovery disputes that have arisen
20 since the discovery responses were received, but it appears at least some of those disputes
21 will need to be submitted to the Magistrate Judge for a decision.

22 15. An extension of the discovery cut-off date, and all other related deadlines, is
23 necessary due to the need to resolve discovery disputes, locate pertinent documents and
24 information, and otherwise conduct discovery in this case.

25 16. This request is being made more than 21 days before the discovery deadline of
26 June 17, 2025.

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1 17. This request for an extension of time is not sought for any improper purpose
2 or other purpose of delay. Rather, it is sought by the parties to allow sufficient time for the
3 resolution of discovery disputes in this matter and to otherwise conduct proper discovery.

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1 WHEREFORE, the parties respectfully request that the Court extend the deadline for
 2 discovery deadline by 90 days to September 15, 2025. As that extension will impact other
 3 discovery deadlines, the parties respectfully request that the Court also extend the following
 4 deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Initial Expert Witness Disclosure	April 18, 2025	N/A (Passed)
Rebuttal Expert Witness Disclosure	May 19, 2025	N/A
Discovery Deadline	June 17, 2025	September 15, 2025
Dispositive Motion Deadline	July 17, 2025	October 15, 2025
Joint Pre-Trial Order Deadline	August 15, 2025	November 17, 2025 (or 30 days after decision on any dispositive motions)

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 15 DATED this 30th day of April, 2025.

16 **CHRISTENSEN JAMES & MARTIN, CHTD.**

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22 IT IS SO ORDERED

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 24 Hon. Maximiliano D. Couvillier III
 United States Magistrate Judge
 25 DATED: 5/1/2025